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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	No.
	)	
Plaintiff,	)	<u>COUNTS 1 - 2:</u>
	)	SEXUAL EXPLOITATION OF A CHILD –
v.	)	PRODUCTION OF CHILD PORNOGRAPHY
	)	Vio. of 18 U.S.C. § 2251(a) and (e)
AJELA AKESHA BANKS,	)	
	)	<u>COUNT 3:</u>
Defendant.	)	SEXUAL EXPLOITATION OF A CHILD –
	)	POSSESSION OF CHILD PORNOGRAPHY
	)	Vio. of 18 U.S.C. § 2252(a)(4)(B)
	)	and (b)(2)
	)	
	)	<u>CRIMINAL FORFEITURE ALLEGATION</u>
	)	Vio. 18 U.S.C. § 2253
	)	
	)	

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INDICTMENT

The Grand Jury charges that:

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### COUNT 1

On or about November 26, 2018, in the District of Alaska, the defendant, AJELA AKESHA BANKS, did employ, use, persuade, induce, entice, and coerce “JUVENILE A,” a minor, with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce; was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and was transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce.

All of which is in violation of 18 U.S.C. § 2251(a) and (e).

### COUNT 2

On or about November 27, 2018, in the District of Alaska, the defendant, AJELA AKESHA BANKS, did employ, use, persuade, induce, entice, and coerce “JUVENILE A,” a minor, with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce; was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and was transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce.

All of which is in violation of 18 U.S.C. § 2251(a) and (e).

### COUNT 3

On or about December 20, 2018, within the District of Alaska, the defendant, AJELA AKESHA BANKS, did knowingly possess matter, to wit: an Apple iPhone 6s, containing visual depictions of a minor engaging in sexually explicit conduct that have been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which were produced using materials that have been mailed and shipped and transported, by any means including by computer.

All of which is in violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2).

### CRIMINAL FORFEITURE ALLEGATION

Upon conviction of Counts 1 through 3 of this Indictment, defendant AJELA AKESHA BANKS, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a), her interest in any and all matter which contains visual depictions produced, transported, mailed, shipped, or received in violation thereof; any property constituting or traceable to gross profits or other proceeds the defendant obtained as a result of the aforementioned violation; and any and all property used or intended to be used to commit and to promote the commission of the aforementioned violation, including but not limited to the following:

- (1) an iPhone 6s seized on December 20, 2018.

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All pursuant to 18 U.S.C. § 2253 and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Kyle Reardon  
KYLE REARDON  
United States of America  
Assistant U.S. Attorney

s/ Bryan Schroder  
BRYAN SCHRODER  
United States Attorney  
United States of America

DATE: 1/15/19